

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

WALTER SCOTT LAMB,)	
Plaintiff/Counterclaim Defendant,)	Case No. 6:21-cv-00055
v.)	Hon. Norman K. Moon
)	
LIBERTY UNIVERSITY, INC.,)	
a Virginia corporation,)	
Defendant/Counterclaim Plaintiff.)	

LAMB’S MOTION TO COMPEL AND OVERRULE OBJECTIONS

Comes now Walter Scott Lamb, by counsel, and pursuant to Federal Rule of Civil Procedure 37, moves this Court to compel responses and overrule objections pertaining to Lamb’s Requests for Production 6, 7, 10, 11, 14, 19, and 24, and Interrogatory 18, and all such further relief as may be appropriate, including attorney fees pursuant to Federal Rule of Civil Procedure 37, for the reasons stated in the accompanying brief.

The undersigned counsel certifies that counsel has attempted to confer to resolve this dispute without court action.

Respectfully submitted,
WALTER SCOTT LAMB

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By: /s/ Andrew T. Bodoh, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June, 2022, I presented the foregoing document(s) to the Clerk of the Court for filing and uploading to the CM/ECF system, which will provide electronic notice and copies of such filing(s) to counsel of record.

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